

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	No. 4:23 MJ 2288 JSD
)	
ALAN BILL)	
a/k/a "Vend0r")	
a/k/a "KingdomOfficial")	
)	
Defendant.)	

MOTION FOR PRE-TRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Kyle T. Bateman, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the Government states as follows:

1. Defendant is charged by complaint with, *inter alia*, an offense for which a maximum term of imprisonment of ten years or more is prescribed in the Controlled Substances Act (Title 21, United States Code, Section 801, et seq.), or chapter 705 of Title 46 (Maritime Drug Law Enforcement), specifically, drug trafficking conspiracy in violation of 21 U.S.C. §§ 846 and 841(a)(1).

2. Accordingly, a rebuttable presumption arises pursuant to Title 18, United States Code, Section 3142(e)(3) that there are no conditions or combination of conditions which will reasonably assure the appearance of the defendant as required, and the safety of any other person and the community.

3. There is a serious risk that the defendant will flee. The defendant is a Slovakian national who resides in Bratislava, Slovakia, and who has no ties to the United States. Over the course of the past year, the defendant has travelled extensively across the world.

4. The defendant is a threat to the community. The defendant is charged with being the administrator of a dark net marketplace that has thousands of listings for sale of illicit goods and services around the world.

WHEREFORE, the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

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